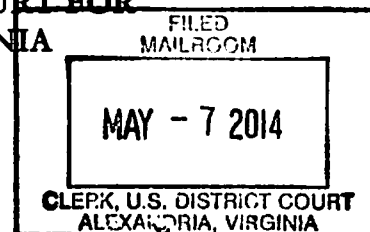


**IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF VIRGINIA**



EDNA D. FORDHAM,

Plaintiff,

v.

FREDDIE MAC, et. al.

Defendants.

Case No. 1:13-cv-910

**PLAINTIFFS' MOTION TO STAY
PROCEEDINGS PENDING APPEAL**

Plaintiff, Edna D. Fordham respectfully move this Court pursuant to Fed. R. Civ. P. 7(b) for entry of an order staying the proceedings until ten (10) days after the Fourth Circuit issues a ruling resolving Plaintiff's appeal of this Court's grant of Motion to Dismiss. In support, Plaintiff state as follows:

1. On November 15, 2013, Plaintiff filed a Second Amended Complaint which added Defendant Timothy Ledet. Plaintiff raised two claims for relief under federal and three Virginia state law claims for relief.
2. On December 2, 2013, Defendants filed the motion moving to strike and dismiss Plaintiff's complaint. See Dkt. 30.
3. On April 10, 2014, Dkt. 38, the Court entered its orders granting Defendants' motion to Dismiss with Prejudice Counts I, III, IV and V and Granted without prejudice with respect to Count II.
4. On May 2, 2014, Plaintiff filed a Notice of Appeal to this Court, via express mail, in which the Plaintiff appealed this Court's orders granting Defendants' Motion for Dismissal and request the order reviewed before the United States Court of Appeals for the Fourth Circuit.
5. "[T]he power to stay proceedings is incidental to the power inherent in every court to control the disposition of the causes on its docket with economy of time and effort for itself, for counsel, and for litigants." *Landis v. N. Am. Co.*, 299 U.S. 248, 254 (1936).
6. A federal district court "has broad discretion to stay proceedings as an incident to its power to control its own docket." *Clinton v. Jones*, 520 U.S. 681, 706 (1997). *Accord Sierra Club v. United States Army Corps. of Eng'rs*, 446 F.3d 808, 816 (8th Cir. 2006).
7. Plaintiff's pending Motion to Dismiss and upcoming responses raise the legal issues that are likely to be addressed by the Fourth Circuit in adjudicating Plaintiff's appeal of this

8. Judicial efficiency counsels strongly in favor of staying this Court's proceedings pending appeal. Absent an order of this Court staying further proceedings all parties will be required to concurrently litigate this matter in both courts.

9. Such a concurrent litigation process is unnecessarily duplicative and costly and is not designed "to secure the just, speedy, and inexpensive determination of every action and proceeding." Fed. R. Civ. P. 1.

WHEREFORE, Plaintiff Edna D. Fordham respectfully request the Court enter an order staying the proceedings until ten (10) days after the Fourth Circuit issues a ruling resolving Plaintiff's appeal of this Court's grant of dismissal.

Submitted This Day On: May 5, 2014

Respectfully submitted,

A handwritten signature in black ink, reading "Edna D. Fordham". The signature is fluid and cursive, with the first name "Edna" and last name "Fordham" clearly distinguishable.

Edna D. Fordham, Pro Se Litigant
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CERTIFICATE OF SERVICE

I hereby certify that on May 5, 2014, I expressed mailed motion to the Clerk of the United States District Court for the Eastern Virginia and emailed a copy of document to Defendants causing notice of such filing to be served upon all parties' counsel of record.

By: Edna D. Fordham
Pro Se Litigant